

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

JANE DOE,

Plaintiff,

v.

KNOX COUNTY,

Defendant.

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No. 3:22-CV-63-KAC-DCP

MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL

Knox County Board of Education (“KCBOE”) moves this Court for leave to file Exhibit 2 to its Response in Opposition to the Motion for Preliminary Injunction or Temporary Restraining Order under seal for the following reasons:

1. The matter before the Court is an action involving minor student and issues related to the Americans with Disabilities Act and Section 504 of the Rehabilitation Act.
2. As part of its Response to Plaintiff’s motion, KCBOE attached a redacted (including handwritten signatures) copy of Plaintiff’s 504 Plan at L&N STEM Academy.
3. In addition to describing the accommodations provided to Plaintiff by KCBOE, the 504 Plan also includes two medical notes Plaintiff provided to KCBOE as part of the 504 process.
4. Defendant KCBOE believes that it has redacted any and all identifying information but considering Plaintiff’s minor status and the media attention this case has drawn, KCBOE files this Motion to File under seal out of an abundance of caution.

5. The granting of this Motion will not prejudice Plaintiff in anyway as KCBOE will send Counsel for Plaintiff's a copy of its filing as well as the proposed sealed Exhibit upon filing.

For the reasons stated above, KCS moves this Court for leave to file Exhibit 2 to its Response in Opposition to Plaintiff's Motion for a Preliminary Injunction or Temporary Restraining Order under seal.

Respectfully submitted,

s/Amanda Lynn Morse
Amanda Lynn Morse (BPR # 032274)
Deputy Law Director
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Knoxville, TN 37902
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically on the date recorded by the Court's electronic filing system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular United States Mail, postage prepaid. Parties may access this filing through the Court's electronic filing system.

s/Amanda Lynn Morse
Amanda Lynn Morse